

1 Stephanie L. Cooper, Esquire
 Nevada Bar No. 5919
 2 THE COOPER CASTLE LAW FIRM
 f/k/a THE COOPER CHRISTENSEN LAW FIRM, LLP
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 Las Vegas, NV 89107
 4 (702) 435-4175/(702) 435 4181 (facsimile)
 Loan No. 8560702029 / Our File No. 07-09-8719

ECF filed on:

OCT 04 2007

5 Attorney for Secured Creditor
 6 Bridgelock Capital c/o Asset Foreclosure Services, Inc.

7 UNITED STATES BANKRUPTCY COURT
 8 DISTRICT OF NEVADA

9 In re:

10 ADALBERTO CANCIO,
 MARIA A. GUERRERO,
 11 Debtor(s)

CHAPTER 13
 BANKRUPTCY NO.: 07-15249-BAM
 DATE: November 01, 2007
 TIME: 1:30 p.m.

OBJECTIONS TO CONFIRMATION OF PROPOSED CHAPTER 13 PLAN

13 Bridgelock Capital c/o Asset Foreclosure Services, Inc. is a Secured Creditor in the
 14 above-entitled bankruptcy proceeding and hereby submits the following Objections to the
 15 Confirmation of that certain Chapter 13 Plan proposed by Debtors.

16 1. This objecting Creditor holds a security interest in the form of a 2nd deed of trust on
 17 the property located at 1101 Cold Harbor Drive, North Las Vegas, NV 89030.

18 2. As of the filing date of the instant bankruptcy petition on August 22, 2007, the amount
 19 in default pre-petition was \$17,844.71; representing forty-seven (47) monthly payments, late
 20 charges, NSF charges (if any); advances for taxes and insurance (if any); and any foreclosure or
 21 Trustee's fees accrued with respect to the default.

22 3. The plan does not currently set forth the accurate amount for plan payment and does
 23 not propose to pay the arrearages to Bridgelock Capital c/o Asset Foreclosure Services, Inc. in a
 24 reasonable manner.

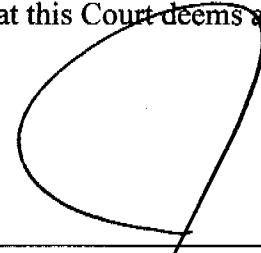
1 4. The Debtors are currently in contravention of 11 U.S.C. § 1322(b)(5) and the plan
2 should not be confirmed as proposed.

3 Any plan proposed by the Debtors must accommodate the accurate pre-petition arrearages
4 as reflected above in order to be reasonable and correct. Additionally, any plan proposed by the
5 Debtor should provide that payments to Bridgelock Capital c/o Asset Foreclosure Services, Inc.
6 begin as expeditiously as possible and that the pre-petition arrearages be paid in their entirety prior
7 to the expiration of sixty months.

8 WHEREFORE, Secured Creditor prays as follows:

- 9 (1) That confirmation of the proposed Chapter 13 plan be denied unless accommodation
10 of the above-referenced numbers can be accommodated;
- 11 (2) For attorneys fees and costs incurred herein in the amount of \$490.00;
- 12 (3) For dismissal of the Chapter 13 proceeding;
- 13 (4) For any and all other relief that this Court deems appropriate.

14 Date: _____

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21 MOTION NO.:
22

**DECLARATION OF MAILING OF SECURED CREDITORS OBJECTIONS TO
CONFIRMATION OF PROPOSED CHAPTER 13 PLAN**

23 The undersigned hereby declares and certifies that on 10/4, 2007 a copy of
24 the Secured Creditors OBJECTIONS TO CONFIRMATION OF PROPOSED CHAPTER 13
25 PLAN was served on the following parties by depositing a copy of the same in the United States
Mail, postage prepaid and addressed to:

Terry Leavitt, Esq.
601 S. 6th Street
Las Vegas, NV 89101

Rick A. Yarnall
Chapter 13 Trustee
701 Bridger Avenue, Suite 820
Las Vegas, NV 89101

ADALBERTO CANCIO
MARIA A. GUERRERO
1101 Cold Harbor Drive
North Las Vegas, NV 89030

I declare under penalty of perjury that the foregoing is true and correct.

An employee of THE COOPER CASTLE LAW FIRM